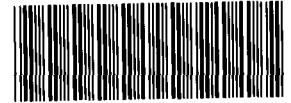


United States Government

Department of Energy

Rocky Flats Office

# memorandum



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DATE DEC 02 1991  
REPLY TO  
ATTN OF ERD RHB 10424

SUBJECT Guidance on Implementing Regulator Comments on the Operable Unit No 6 Work Plan


TO J M Kersh, Associate General Manager  
Environmental Restoration and Waste Management  
EG&G Rocky Flats, Inc

This letter is in response to your letter of November 15, 1991 (91-RF-8098) requesting guidance on implementing regulator comments on the Operable Unit No 6 Work Plan

A meeting of DOE, EG&G, regulator project managers and support staff was held on November 7, 1991. The purpose of the meeting was to get comment clarification from the regulators, and more importantly, to ascertain their reasoning for the comments. Aside from the ARAR issue, which is not resolvable from the project manager level, the regulators greatest desire was inclusion of a conceptual model similar to the OU3 model and additional rationale for the sampling plan. The regulators felt that substantial changes to the sampling plan were made, without sufficient explanation or consultation with the regulator project managers.

The DOE project manager requested EG&G to include the desired conceptual model in the final document as well as detailed rationale supporting the sampling plan that DOE, EG&G and apparently EPA believe is technically sound. This direction was given to EG&G during the meeting and at least three times after the meeting. DOE does not believe it prudent or appropriate to implement EPA/CDH comments through an expanded sampling plan, when a clearly reasoned and written document should suffice.

If the EG&G project manager has a different interpretation of EPA/CDH's concerns or needs additional clarification from DOE, please have him call Robert Burk of my staff at extension 5921 immediately. DOE fully intends to meet its IAG schedule milestones.

  
David P. Simonson  
Assistant Manager  
for Environmental Management

cc  
E Evered, EG&G/RF  
P Bunge, EG&G/RF  
J Ottensman, EG&G/RF

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